

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

U.S. DISTRICT COURT
EASTERN DISTRICT-WI
FILED

2024 JUN 11 P 12:25

CLERK OF COURT

UNITED STATES OF AMERICA,

Plaintiff,

Case No.

24-CR-122

v.

[21 U.S.C. §§ 841(a)(1),
841(b)(1)(B)(viii) & 841(b)(1)(C);
18 U.S.C. §§ 922(g)(1) & 924(a)(8)]

CHEE NENG XIONG,

Defendant.

Green Bay Division

INDICTMENT

COUNT ONE
(Distribution of methamphetamine)

THE GRAND JURY CHARGES THAT:

On or about March 5, 2024, in the State and Eastern District of Wisconsin,

CHEE NENG XIONG

knowingly and intentionally distributed a mixture and substance containing
methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWO
(Distribution of methamphetamine)

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 27, 2024, in the State and Eastern District of Wisconsin,

CHEE NENG XIONG

knowingly and intentionally distributed a mixture and substance containing methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THREE
(Distribution of methamphetamine)

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about April 2, 2024, in the State and Eastern District of Wisconsin,

CHEE NENG XIONG

knowingly and intentionally distributed 50 grams or more of a mixture and substance containing methamphetamine, a Schedule II controlled substance.

2. Before committing the offense charged in this count, defendant Xiong had a final conviction for a serious drug felony, namely, possession with intent to distribute amphetamine as a second or subsequent offense under Wisconsin Statute Sections 961.41(1m(e))³ and 961.48, for which he served more than 12 months of imprisonment.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii).

COUNT FOUR
(Distribution of methamphetamine)

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about April 11, 2024, in the State and Eastern District of Wisconsin,

CHEE NENG XIONG

knowingly and intentionally distributed 50 grams or more of a mixture and substance containing methamphetamine, a Schedule II controlled substance.

2. Before committing the offense charged in this count, defendant Xiong had a final conviction for a serious drug felony, namely, possession with intent to distribute amphetamine as a second or subsequent offense under Wisconsin Statute Sections 961.41(1m(e))³ and 961.48, for which he served more than 12 months of imprisonment.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii).

COUNT FIVE
(Possession of a firearm by a convicted felon)

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about May 16, 2024, in the State and Eastern District of Wisconsin,

CHEE NENG XIONG,

knowing that he previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm which, prior to his possession of it, had been transported in interstate commerce, the possession of which was therefore in and affecting commerce.

2. The firearm is more fully described as a Ruger 9-millimeter pistol bearing serial number 307-61989.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

NOTICE OF FORFEITURE

1. Upon conviction of Counts One, Two, Three, or Four of this indictment, the defendant shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the violations.

2. Upon conviction of Count Five of this indictment, the defendant shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in the offense, including the following seized on May 16, 2024:

- a. a Ruger 9-millimeter pistol bearing serial number 307-61989, loaded with 10 rounds of 9-millimeter ammunition; and
- b. approximately 25 additional rounds of 9-millimeter ammunition.

3. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, pursuant to 21 U.S.C. § 853(p).

A TRUE BILL:



FOREPERSON

Dated: 11 JUNE 2024

A handwritten signature in cursive script, reading "Gregory J. Haanstad".

GREGORY J. HAANSTAD

United States Attorney